

Nelson, Scott

From: Rubino Brothers <rubinobrothers@aol.com>
Sent: Monday, May 08, 2017 2:03 PM
To: Nelson, Scott
Subject: RE: 2016 SLAB annual report

Rubino Brothers Inc.
560 Canal Street
Stamford, CT 06902

Our company did not export any Spent lead Acid Batteries in 2016.

From: Nelson, Scott [mailto:Nelson.Scott@epa.gov]
Sent: Wednesday, May 03, 2017 8:11 AM
To: rrsalvage@bluefrog.com; nbafundi@realpowerinc.com; claudio@renewableplanetllc.com; 766junk@gmail.com; kegerer@rifkin-co.com; jackie.choi416@gmail.com; rubinobrothers@aol.com; servicebatteryinc@yahoo.com; dleonardo@shulmancompany.com; katelyn@shelburneironandmetal.ca; smiusa2015@hotmail.com; mhcho2007@hotmail.com; steve@solomonmetals.com; receptionawny@standardautowreckers.com; kevin.727@hotmail.com; swopesalvage@yahoo.com
Subject: 2016 SLAB annual report

Dear US Primary Exporter of Spent Lead Acid Batteries:

Our records indicate that during 2016 you had a valid consent for the export of Spent Lead Acid Batteries (SLABs). *If you did export SLABs during calendar year 2016* your Annual Report was due by March 1, 2017. *If you did not export SLABs during 2016*, please send us an email stating that your company did not export SLABs during calendar year 2016. Your submission should be mailed to me at the address shown below.

As you may be aware, the EPA finalized a number of changes to the hazardous waste import-export regulations, which are effective on December 31, 2016. However, please note that export shipments of hazardous waste operating in compliance with an Acknowledgment of Consent (AOC) letter issued by EPA prior to December 31, 2016 are subject to export requirements in effect at the time their AOC letter was issued until the consent expires. Your AOC was issued prior to December 31, 2016.

Under the rules that were in effect at the time you AOC was issued, exporters that shipped SLABs to Canada, Mexico, or any country not belonging to the Organization for Economic Cooperation and Development (OECD) must submit an annual report containing all items of information found at 40 CFR Sections 262.56 (a)(1) through (4), (6) and (b). Exporters that shipped SLABs to OECD Member countries other than Canada or Mexico must submit an annual report containing all items of information found at 40 CFR Section 262.87(a). Annual Reports not meeting these requirements, as applicable, will be returned as deficient. **Failure to file a timely and accurate annual report of SLAB exports can result in a penalty of up to \$32,500 per day.** You may access these regulations by clicking on <https://www.epa.gov/hwgenerators/resource-conservation-and-recovery-act-rcra-requirements-previously-consented-exports>

For your convenience we have attached a user-friendly, optional Excel spreadsheet, which you can use to submit your Annual Report. This spreadsheet contains all the Annual Report elements you must report as required by 40 CFR 262.56 and 40 CFR 262.879(a) and provides detailed instructions to assist you in completing your submittal. If you received this letter via mail and would like to receive a copy of the optional Excel spreadsheet, please contact Scott Nelson at nelson.scott@epa.gov to receive the electronic file.

Received
SDN May 8/2017

Should you choose to use the attached optional Excel spreadsheet, we request that you submit it both in electronic form to me at nelson.scott@epa.gov and in signed and dated hardcopy via mail to the address listed below. Your cooperation will assist us with compiling the 2016 data expeditiously.

Sincerely,

Scott Nelson, Environmental Protection Specialist
US Environmental Protection Agency
Office of Federal Activities
International Compliance Assurance Division (2254A)
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460